

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

## Caption in Compliance with D.N.J. LBR 9004-2 (c)

In the Matter of  
Robert C. Nisenson, LLC  
10 Auer Court  
East Brunswick, New Jersey 08816  
Attorney for Debtor  
(732) 238-8777  
Robert C. Nisenson  
RCN 6680

Karen L. Waldorf

Debtor.

Case No.: 19-13417

Judge: CMG

**ORDER TO APPROVE LOAN MODIFICATION AND COMPEL  
HUSBAND TO SIGN LOAN MODIFICATION AGREEMENT AND/OR  
SIGN A POWER OF ATTORNEY TO KAREN L. WALDORF AND/OR  
TO COOPERATE WITH THE LOAN MODIFICATION PROCESS**

The relief set forth on the following pages, numbered two (2) through \_\_\_\_\_ is  
hereby **ORDERED**.

**ROBERT C. NISENSEN, L.L.C.**

10 Auer Court  
East Brunswick, NJ 08816  
(732) 238-8777  
Attorneys for Debtor  
Robert C. Nisenson, Esq.  
RCN 6680

**UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NEW JERSEY**

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In the Matter of	:	Case: 19-13417
	:	Chapter 13
Karen L. Waldorf	:	
	:	
	:	
Debtor.	:	<b>ORDER TO APPROVE LOAN</b>
	:	<b>MODIFICATION AND TO</b>
	:	<b>COOPERATE WITH LOAN</b>
	:	<b>MODIFICATION</b>

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This matter having been opened to the Court by Robert C. Nisenson, Esq., of the Law firm of Robert C. Nisenson, L.L.C., attorneys for Debtor, upon application for an Order to Approve the Loan Modification with Wells Fargo Bank N.A. and to Compel Debtor's Husband to sign the loan modification documents or provide a Power of Attorney for her to sign the documents or Cooperate with Loan Modification and the Court having considered all supporting and opposing papers, if any, and good cause appearing for the entry of this Order;

It is on the            day of            , 2019;

**ORDERED** the Debtor and Wells Fargo Bank N.A. are authorized to enter into the Loan Modification Agreement and it is further;

**ORDERED** in the event a loan modification is completed and the pre-petition arrears are capitalized into the loan, Secured Creditor shall amend the arrearage portion

of its proof of claim to zero or withdraw the claim within thirty (30) days of completion of the loan modification; and it is further

**ORDERED**, that the Chapter 13 Trustee shall suspend disbursements to Secured Creditor pending completion of loan modification and all money that would otherwise to be paid to Secured Creditor, be held until the arrearage portion of the claim is amended to zero or the claim is withdrawn, or the Trustee is notified by the Secured Creditor that the modification was not consummated; and it is further

**ORDERED**, in the event the modification is not consummated, the Secured Creditor shall notify the Trustee and Debtor's Attorney of same. Any money that was held by the Trustee pending completion of the modification shall then be paid to Secured Creditor; and it is further

**ORDERED**, in the event the proof of claim is amended to zero or withdrawn, the Trustee may disburse the funds being held pursuant to this order to other creditors in accordance with the provisions of the confirmed plan; and it is further

**ORDERED**, Debtors shall file an amended Schedule J and Modified Plan within twenty (20) days of this Order; and it is further

**ORDERED**, that the Secured Creditor will reduce their proof of claim within 40 days, otherwise Debtors will have to file a Motion to Reduce the Claim and the creditor will be responsible for Debtor's attorney fees of \$400.00 for the filing of said motion.

**ORDERED** that the Debtor's husband, Eric Waldorf, within 7 days of this Order to sign the Loan Modification Agreement or provides our client with a Power of Attorney and/or Cooperates with the Loan Modification process for the mortgages. If Eric Waldorf

fails to execute the Loan Modification documents or a Power of Attorney within 7 days, the Debtor is authorized to execute the documents on his behalf; and it is further

**ORDERED** that Eric Waldorf is compelled to cooperate with the Debtor to sign any necessary forms and provide any necessary documents in connection with the loan modification for her second mortgage with Wells Fargo Bank within 10 days; and it is further

**ORDERED** that a copy of this Order shall be served upon all parties within \_\_\_\_\_ days of the date hereof.